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August 9, 2019

**Ex Parte Letter filed via ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Washington, DC 20554

**Re: *Promoting Telehealth in Rural America*, WC Docket No. 17-310; *Rural Health Care Support Mechanism*, WC Docket No. 02-60**

Dear Ms. Dortch,

In a discussion with staff about the availability of rate information for certain services, AT&T agreed to provide retail rate information that it makes publicly available on its website for access services that are frequently discounted through the Rural Health Care Telecom Program. The attached information is available through the "AT&T Bandwidth Services" Service Guide at [https://serviceguidenew.att.com/sg\\_landingpage?tgtPg=sg\\_homecontentpage](https://serviceguidenew.att.com/sg_landingpage?tgtPg=sg_homecontentpage).

Rate information is available through this Service Guide for T-1s and, among other things, switched Ethernet access channels ranging in speeds from 2 Mbps to 1 GB. The Service Guide also contains historical rate information for these services. AT&T's T-1 pricing is nationwide, which means AT&T's T-1 rates are the same in urban areas and in rural areas. Its switched Ethernet rates are provided across just over 100 zones. The zones correspond to the identity of the underlying provider. AT&T's rates where an AT&T affiliate is the incumbent local exchange carrier (ILEC) (Zones 1, 1A, 2, and 2A) are generally lower than where AT&T obtains the access from a non-AT&T ILEC (Zones 3 through 101C).<sup>1</sup> Similarly, AT&T's rates in Zones 1A and 2A are slightly lower than its rates for Zones 1 and 2. Zones 1A and 2A encompass competitive serving wire centers. For example, the list price for a 50 Mbps Ethernet circuit in Nashville, Tennessee, which is served via a competitive wire center (e.g., NSVLTNDO), is \$1,134.00/month and is \$1,359.15/month in a non-competitive serving wire

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<sup>1</sup> Rates for AT&T's competitive local exchange carriers are listed among Zones 3 through 101C. AT&T Southeast (Zones 2 and 2A) is an ILEC in parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee. AT&T is an ILEC outside of the Southeast (Zones 1 and 1A) in parts of Arkansas, California, Illinois, Indiana, Kansas, Michigan, Missouri, Nevada, Ohio, Oklahoma, Texas, and Wisconsin.

center in Tennessee. Additionally, AT&T offers significant discounts off of its list prices for customers that sign contracts ranging in length from 12 months to more than 60 months.

Attached to this letter are several excerpts from the “AT&T Bandwidth Services” Service Guide that provide some of the information described above. However, other information is accessible via hyperlinks embedded in the Service Guide and some of that information is displayed in spreadsheets that are not conducive to converting to a pdf document. For example, details about AT&T’s Zones are found in twelve tabs, accessible via the “Current Zone Definitions” link, found on page 93, among other pages. Similarly, AT&T’s switched Ethernet access channel rate information, available via a link on page 132, is provided in over 100 columns, each corresponding to a zone.

Please let me know if you have any questions about the rate information AT&T makes publicly available in its service guides, including the “AT&T Bandwidth Services” Service Guide.

Sincerely,

/s/ Cathy Carpino

Cathy Carpino

Attachment

cc: (via email)  
Trent Harkrader  
Ryan Palmer  
Liz Drogula  
Regina Brown  
Carol Pomponio  
Johnnay Schrieber

**ATTACHMENT**

**AT&T Business Service Guide**  
**AT&T Bandwidth Services**

<b>Rate Table ACS-DOM-B-US: US Domestic* Access Channels (other than Alaska) - Schedule B</b>				
<b>Access Channel</b>	<b>Fixed</b>	<b>Per Mile</b>	<b>Installation Charge</b>	<b>Notes</b>
DS0 (GDA) (11-20 miles)	\$5,714.00	\$0.00	\$500.00	<DS0>
DS0 (GDA) (21-50 miles)	\$6,111.00	\$0.00	\$500.00	<DS0>
DS0 (GDA) (51+ miles)	\$4,806.00	\$70.55	\$500.00	<DS0>
T1 (0-5 miles)	\$435.00	\$0.00	\$750.00	<T1> <NET>
T1 (6-10 miles)	\$560.00	\$0.00	\$750.00	<T1> <NET>
T1 (11-20 miles)	\$651.00	\$0.00	\$750.00	<T1> <NET>
T1 (21-50 miles)	\$754.00	\$0.00	\$750.00	<T1> <NET>
T1 (51+ miles)	\$674.00	\$8.00	\$750.00	<T1> <NET>
<p>Notes:</p> <p>* Applicable in the US Mainland, Hawaii, US Virgin Islands and Puerto Rico.</p> <p>&lt;DS0&gt; USOC: 1LNH9 for 9.6 kbps, USOC: 1LNR9 for 56 kbps and USOC: 1LNS9 for 64 kbps.</p> <p>&lt;NET&gt; Rates for On-Net T1 Access Channel - Schedule B (USOC: 1LNM3) and T1 On-Net STSI Access Channel - Schedule B (USOC: 1LNST) apply to orders placed on or after October 30, 2006. On-Net is not available at all locations so availability must be validated by AT&amp;T Corp.</p> <p>&lt;T1&gt; USOC: 1LNV9</p> <p>&lt;VG&gt; The rates apply for one-way and two-way VG Access Channels. USOCs: 1LNK9 for one-way and 1LNL9 for two-way.</p>				

**Cross References**

[SD-1.4.2.1. Geographic Availability Table for Access Channel Service Components](#)

[P-2.1.2. DSVPP-Eligible Service Components – BWS](#)

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This document reflects the Service Guide in effect as of August 05, 2019

**P-4.2.5.9. US Domestic Ethernet Access Channels – Switched excluding connections to Ethernet IOCs – Monthly and Installation Charges****P-4.2.5.9.1. Current – US Domestic Ethernet Access Channels – Switched excluding connections to Ethernet IOCs – Monthly and Installation Charges***Section Effective Date: 20-Jun-2019*

<b>Current - US Domestic Ethernet Access Channels - Switched excluding connections to Ethernet IOCs - Monthly and Installation Charges</b>	
<b>Rate Effective Date</b>	<b>Link</b>
June 20, 2019*	<a href="#">Current Zone Pricing Tables - Switched</a>
Notes:	
*	For orders placed on or after June 20, 2019 (orders based on quotes generated within 90 days prior to June 20, 2019 may use prior rates).

## Cross References

[P-2.2.1. Current Ethernet Access Channel – Zone Definitions](#)**P-4.2.5.9.2. Historical – US Domestic Ethernet Access Channels – Switched excluding connections to Ethernet IOCs – Monthly and Installation Charges***Section Effective Date: 20-Jun-2019*

<b>Historical - US Domestic Ethernet Access Channels - Switched excluding connections to Ethernet IOCs - Monthly and Installation Charges</b>
<b>Links</b>
<a href="#">Zone Pricing Tables - Switched - For May 20, 2019 through June 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For April 20, 2019 through May 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For March 20, 2019 through April 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For February 20, 2019 through March 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For January 20, 2019 through February 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For December 20, 2018 through January 19, 2019</a>
<a href="#">Zone Pricing Tables - Switched - For November 20, 2018 through December 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For October 20, 2018 through November 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For September 20, 2018 through October 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For July 20, 2018 through September 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For June 20, 2018 through July 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For April 20, 2018 through June 19, 2018</a>
<a href="#">Zone Pricing Tables - Switched - For March 20, 2018 through April 19, 2018</a>

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Historical - US Domestic Ethernet Access Channels - Switched excluding connections to Ethernet IOCs - Monthly and Installation Charges	
Links	
<a href="#">Zone Pricing Tables - Switched - For January 20, 2018 through March 19, 2018</a>	
<a href="#">Zone Pricing Tables - Switched - For December 20, 2017 through January 19, 2018</a>	
<a href="#">Zone Pricing Tables - Switched for October 20, 2017 through December 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched For September 20, 2017 through October 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched For July 20, 2017 through September 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For April 20, 2017 through July 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For March 20, 2017 through April 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For February 20, 2017 through March 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For January 20, 2017 through February 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For December 20, 2016 through January 19, 2017</a>	
<a href="#">Zone Pricing Tables - Switched - For November 20, 2016 through December 19, 2016</a>	
<a href="#">Zone Pricing Tables - Switched - For August 20, 2016 through November 19, 2016</a>	
<a href="#">Zone Pricing Tables - Switched - For June 20, 2016 through August 19, 2016</a>	
<a href="#">Zone Pricing Tables - Switched - For April 20, 2016 through June 19, 2016.</a>	
<a href="#">Zone Pricing Tables - Switched - For October 20, 2015 through April 19, 2016</a>	

#### P-4.2.5.10. US Domestic Ethernet Access Channels – Dedicated – Monthly and Installation Charges

##### P-4.2.5.10.1. Current – US Domestic Ethernet Access Channels – Dedicated – Monthly and Installation Charges (includes On-Net and Carrier Hotel)

Section Effective Date: 20-May-2019

Current - US Domestic Ethernet Access Channels - Dedicated - Monthly and Installation Charges (includes On-Net and Carrier Hotel)	
Rate Effective Date	Link
May 20, 2019*	<a href="#">Current Zone Pricing Table - Dedicated</a>
Notes:	
*	For orders placed on or after May 20, 2019 (orders based on quotes generated within 90 days prior to May 20, 2019 may use prior rates).

#### Cross References

##### [P-2.2.1. Current Ethernet Access Channel – Zone Definitions](#)

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P-4.2.5.9.1. Current – US Domestic Ethernet Access Channels – Switched excluding connections to Ethernet IOCs – Monthly and Installation Charges**P-4.2.5.10.2. Historical – US Domestic Ethernet Access Channels – Dedicated – Monthly and Installation Charges (includes On-Net and Carrier Hotel)***Section Effective Date: 20-May-2019*

<b>Historical - US Domestic Ethernet Access Channels - Dedicated - Monthly and Installation Charges (includes On-Net and Carrier Hotel)</b>	
<b>Links</b>	
<a href="#">Zone Pricing Tables - Dedicated - For January 20, 2019 through May 19, 2019</a>	
<a href="#">Zone Pricing Tables - Dedicated - For October 20, 2018 through January 19, 2019</a>	
<a href="#">Zone Pricing Tables - Dedicated - For August 20, 2018 through October 19, 2018</a>	
<a href="#">Zone Pricing Tables - Dedicated - For July 20, 2018 through August 19, 2018</a>	
<a href="#">Zone Pricing Tables - Dedicated - For June 20, 2018 through July 19, 2018</a>	
<a href="#">Zone Pricing Tables - Dedicated - For April 20, 2018 through June 19, 2018</a>	
<a href="#">Zone Pricing Tables - Dedicated - For March 20, 2018 through April 19, 2018</a>	
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<a href="#">Zone Pricing Tables - Dedicated - For November 20, 2016 through December 19, 2016</a>	
<a href="#">Zone Pricing Tables - Dedicated - For August 20, 2016 through November 19, 2016</a>	
<a href="#">Zone Pricing Tables - Dedicated - For April 20, 2016 through August 19, 2016</a>	

**P-4.2.5.11. Ethernet Access Channel Discount****P-4.2.5.11.1. US Domestic Ethernet Access Channel Discount Table***Section Effective Date: 20-Aug-2018*

<b>US Domestic Ethernet Access Channel Discount Table</b>		
<b>Term*</b>	<b>Ethernet Access Channel – Switched Ethernet Access Channel – Dedicated Discount**</b>	<b>On-Net Ethernet Access Channel – Dedicated On-Net Ethernet Access Channel – Dedicated – Carrier Hotel Discount** Grandfathered #</b>
12 - 23 months	24%	45%

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US Domestic Ethernet Access Channel Discount Table		
Term*	Ethernet Access Channel – Switched Ethernet Access Channel – Dedicated Discount**	On-Net Ethernet Access Channel – Dedicated On-Net Ethernet Access Channel – Dedicated – Carrier Hotel Discount** Grandfathered #
24 – 35 months	26%	48%
36 - 47 months	29%	50%
48 - 59 months	29%	52%
60+ months	29%	53%
Notes:		
	Ethernet Access Channel – Switched and Ethernet Access Channel – Dedicated include Zones 90, 90A, 90B, 90C, 91, 91A, and 91B (formerly known as 92).	
*	Term of Customer's Service Agreement, which shall also be the term of Customer's Ethernet Access Channel under this plan. Not all term lengths are available in all zones. Term extensions to the Customer's Service Agreement do not modify the term used to determine the discounts as specified above.	
**	<p>These discounts off the Service Guide rates for Ethernet Access Channels and On-Net Ethernet Access Channels apply only to orders placed between April 4, 2011 and December 31, 2014, for Ethernet Access Channels and/or On-Net Ethernet Access Channels connecting to ADI service, and only where Customer's Service Agreement does not have other pricing applicable to such Ethernet Access Channels and/or On-Net Ethernet Access Channels.</p> <p>These discounts off the Service Guide rates for Ethernet Access Channels and On-Net Ethernet Access Channels apply only to orders placed on or after January 1, 2015, for Ethernet Access Channels and/or On-Net Ethernet Access Channels (excluding connections to Ethernet IOCs), and only where Customer's Service Agreement does not have other pricing applicable to such Ethernet Access Channels and/or On-Net Ethernet Access Channels.</p>	
#	<p>Effective April 5, 2018, Customers may no longer renew or extend existing Access Channel Services, On-Net Ethernet Access Channel – Dedicated and On-Net Ethernet Access Channel – Dedicated – Carrier Hotel service components within existing service agreements. Following the expiration of Customer's current service term containing On-Net Ethernet Access Channel – Dedicated and On-Net Ethernet Access Channel – Dedicated – Carrier Hotel, AT&amp;T will provide this service component on a month-to-month basis until the service component is discontinued (currently planned for April 1, 2023 or upon the expiration of Customer's current term agreement, whichever is later).</p> <p>Effective April 5, 2018, AT&amp;T will no longer accept Move, Addition and Change orders for Access Channel Services, On-Net Ethernet Channel – Dedicated and On-Net Ethernet Access Channel – Dedicated – Carrier Hotel. After April 5, 2018, AT&amp;T will no longer accept requests for changes to Customer's service, including the upgrade or downgrade of access speed, installation of new service, or moves to different service addresses.</p>	

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